

## UNITED STATES DISTRICT COURT

for the  
Middle District of Alabama

In the Matter of the Search of

*(Briefly describe the property to be searched  
or identify the person by name and address)*Priority Mail 2-Day parcel addressed to Herschel Amon,  
315 Federal Drive, Montgomery, AL 36107-1731 bearing  
tracking number 9510810052887342098673

Case No. 2:17mj 303 GMB

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location):*

Priority Mail 2-Day parcel addressed to Herschel Amon, 315 Federal Drive, Montgomery, AL 36107-1731 bearing tracking number 9510810052887342098673

located in the Middle District of Alabama, there is now concealed *(identify the person or describe the property to be seized):*

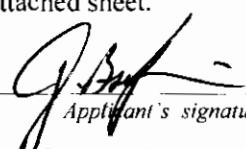
controlled substances, materials and documents reflecting the distribution of controlled substances through the U.S. Mails, including money and/or monetary instruments consisting of payment and/or proceeds relative to the distribution of controlled substances

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more):*

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

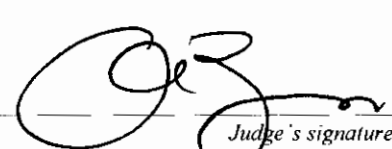
	Code Section	Offense Description
21	841(a)(1) and 843(b)	

The application is based on these facts:  
See attached affidavit (ATTACHMENT 1) incorporated herein by reference and made part of this application.☒ Continued on the attached sheet.☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.  
Applicant's signature

J. Boykins, Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: 12-15-17  
Judge's signatureCity and state: Montgomery, AL

Gray M. Borden, U.S. Magistrate Judge

Printed name and title

**ATTACHMENT A**  
**AFFIDAVIT IN SUPPORT OF SEARCH WARRANT**

The undersigned, being duly sworn on oath, deposes and says:

1. I am a Postal Inspector with the United States Postal Inspection Service ("USPIS"), and have been employed in this capacity since February of 2013. I am currently assigned to the Houston Division's Montgomery, Alabama domicile. I am an "investigative or law enforcement officer" within the meaning of Title 18, United States Code ("U.S.C.") Section 2510(7). That is, I am an officer of the United States who is empowered by law to conduct investigations and to make arrests for crimes furthered through the use of the U.S. Mail or in connection to the U.S. Postal Service ("USPS"), property of the USPS, and other postal offenses, as set forth in 18 U.S.C. § 3061. The following information has been obtained by me personally or has been provided to me by other law enforcement officers and postal employees. This affidavit only contains information necessary to support probable cause for a search warrant and is not intended to include every fact observed by your affiant or known to the government.

2. Prior investigations by USPIS have shown that the United States Mail is being used to transmit illegal controlled substances and proceeds from illegal controlled substances. In your affiant's training and experience, some areas of the country are known to be major sources for illegal drugs (drug source locations) being mailed into the state of Alabama. These drug source locations include the states of California, Arizona, Texas, Colorado, Nevada, and Washington. In your affiant's training and experience, drugs flow from these drug source locations to places like Montgomery, Alabama. In turn, proceeds from the sale of these illegal drugs are then mailed back to the drug source locations as payment for the illegal drugs. I have participated in numerous investigations involving the mailing of controlled substances from these drug source locations to Montgomery, Alabama and to other areas. I have also been involved in numerous investigations where packages containing drug proceeds were seized enroute in the United States Mail to these drug source locations. My training and previous experience has made me familiar with the method and manner that drug traffickers use to move illegal drugs and drug proceeds through the United States Mail.

3. Along with narcotics originating from source states, USPIS investigations have shown that items such as steroids and the substances used to manufacture steroids frequently originate overseas and are mailed or shipped into the United States. I, along with other agents whom I have worked with, have personally seen items used to manufacture steroids as well as other synthetic drugs, and medications mailed or shipped into the United States from countries such as Canada, China, India, the Netherlands, and Thailand. Steroids and other synthetic drugs are not the only items being mailed into the United States. USPIS investigations have shown that items such as fentanyl, "Molly", ecstasy and Xanax pills mailed or shipped into the U.S. from Canada as well.

4. Your affiant is aware that the distribution of illegal drugs and narcotics, and proceeds from the sales of these illegal drugs and narcotics through the United States Mails can make United States Postal Service employees and facilities targets of crimes during the unknowing delivery of drug or proceeds packages. Your affiant is also familiar with investigations where United States Postal Service employees have been targeted for robbery because of packages known to contain illegal drugs and/or proceeds from the distribution of illegal drugs.

5. On or about December 13, 2017, the postal staff at the downtown Montgomery Post Office alerted Postal Inspectors about an inbound Priority Mail 2-Day parcel. Postal staff brought to Inspector's attention delivery procedures that are not within policy. Inspectors noticed the following parcel originating from the state of Nevada. The postage paid for the parcel was paid in Nevada.

6. The parcel was placed in the mail stream on December 8, 2017, originating from Las Vegas, Nevada and is described below:

Tracking Number:	9510810052887342098673
Color:	Brown Parcel
From:	Maria Amon 3922 Eagle Rose St. N. Las Vegas, NV 89032
To:	Herschel Amon 315 Federal Drive Montgomery, AL U.S.A 36107
Postage:	\$25.30
Weight:	Approx. 5 lbs 14.9oz.

This parcel is now in the custody of the U.S. Postal Inspection Service, Montgomery Field Office.

7. On or about December 13, 2017, I conducted a computerized address check via CLEAR (an internet based records search databases) and determined that the "From" originating address on the parcel appeared to be associated with the sender's address. In addition, CLEAR records illustrated both the sender and addressee appears to be associated with one another. An additional search was conducted utilizing Alacop (an internet based records database search for the Alabama LEO community). The search did not yield any association of the addressee to the address.

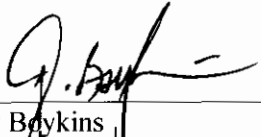
8. The sender placed a signature confirmation on the package, requiring a signature before

delivery. Postal staff provided a restricted report that was system generated by the sender in regards to attempting a redelivery. This message was generated based on a previous attempt that was made by a mail carrier to deliver the package. The message provided stated, "*WILL NOT BE AVAILABLE AT THE TIME OF DELIVERY. PLEASE LEAVE THE PACKAGE AT THE FRONT OF THE STEPS OF THE HOUSE.*" The report provided the addressee's name and address, along with a cell phone number of (702)374-5388. Because this is a signature confirmation package, it cannot be left on the door steps which against postal policy. Based on my training and experience, persons involved in the distribution of controlled substances via the United States Mail operate in this method as well as a send packages with a waiver of signature request, in an attempt to disassociate themselves from the controlled substances.

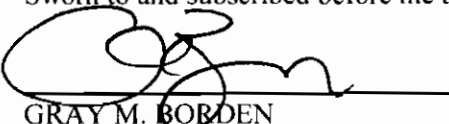
9. On December 13, 2017, trained narcotics dog handler Lt. Richard Talley, Alabama Department of Corrections, and his narcotics detector dog "Ace" conducted an exterior inspection of the Priority Mail package bearing tracking number 9510810052887342098673; the dog alerted, indicating the package contained the scent of controlled substances.

10. Your affiant has been advised of the qualifications of the canine handler and his narcotics detection canine, "Ace," which is more fully described in Exhibit 1, filed in conjunction herewith and incorporated by reference herein.

11. The Priority Mail 2-Day package bearing tracking number 9510810052887342098673 has been maintained unopened in the custody of the Postal Service in this District pending application for a search warrant.

  
Jerry Boykins  
United States Postal Inspector

Sworn to and subscribed before me this 15<sup>th</sup> day of December 2017, at Montgomery, Alabama.

  
GRAY M. BORDEN  
United States Magistrate Judge

## **EXHIBIT 1**

"Ace" is a male Beligum Malinois approximately 4 years old, and has been working as a K9 narcotics detector dog since 2013. "Ace" participates in minimum of 16 hours of in-service training per month, as well as routine usage. Per his handler, Lt. Richard Talley, "Ace" was certified through Central Alabama Police K-9 Training Association, Inc., and Alabama Canine Law Enforcement Officer's Training Center, Inc. "Ace" is certified to detect cocaine, marijuana, heroin, methamphetamine, crack and MDMA.

Lt. Talley has been a canine narcotic handler with Alabama Department of Corrections for approximately 9 years; and has worked with "Ace" for approximately 3 years. Lt. Talley has confirmed the K-9's credibility and reliability.

"Ace" has successfully alerted hundreds of times during training and real life situations. "Ace" is available 7 days a week to conduct drug sniffs for Alabama Department of Corrections and other outside agencies. "Ace" has several narcotic arrests.